
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEITH FETSURKA, et al.,	:	
Plaintiffs	:	
v.	:	Case No. – 2:20-cv-05857
	:	
DANIELLE OUTLAW, et al.,	:	
	:	
Defendants	:	

Motion for Entry of Judgment Pursuant to Offer of Judgment Under FRCP Rule 68

Plaintiffs Keith Fetsurka, Timothy Sieck, Nicolas Defina, Andrew Scott, and Firearms Policy Coalition, Inc., by and through counsel, bring this motion for entry of judgment against Defendants Danielle Outlaw and the City of Philadelphia in the amount of \$30,000.00 for all claims for damages, costs, attorneys’ fees and interest accrued to date and an injunctive order imposing the terms specified in Defendants’ Offer of Judgment attached to this motion as Exhibit A. In support of the same, Plaintiffs state the following:

1. On March 25, 2021, Defendants submitted an Offer of Judgment to Plaintiffs pursuant to Rule 68 of the Federal Rules of Civil Procedure (FRCP) (Exhibit A).
2. On March 25, 2021, Plaintiffs accepted Defendants’ Offer of Judgment and sent Defendants’ counsel a formal Notice of Acceptance on March 26, 2021 (Exhibit B).
3. Rule 68 provides that if “the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service,” whereupon “[t]he clerk must then enter judgment.” FRCP, Rule 68(a).

Therefore, Plaintiffs respectfully request entry of judgment against Defendants Danielle Outlaw and the City of Philadelphia in accordance with the terms of the Offer of Judgment (Exhibit A), with immediate execution of the same.

Respectfully Submitted,

/s/ Raymond M. DiGuiseppe
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Admission by Pro Hanc Vice
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